

GREENBERG TRAURIG, LLP

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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23-12825 (MBK)

**APPLICATION FOR THE *PRO HAC VICE*
ADMISSION OF SANDEEP QUSBA, ESQ.**

Bausch Health US, LLC f/k/a Valeant Pharmaceuticals North America LLC, Bausch Health Americas, Inc. f/k/a Valeant Pharmaceuticals International, and Bausch Health Companies Inc. f/k/a Valeant Pharmaceuticals International, Inc. and all of their affiliates (collectively, “Bausch Health”), by their undersigned co-counsel, Greenberg Traurig, LLP, respectfully make this application (the “Application”), for *pro hac vice* admission of Sandeep Qusba, Esq., and represents as follows:

1. On October 14, 2021, the above-captioned debtor and debtor-in-possession (the “Debtor”), filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, as amended the (“Chapter 11 Case”) in the United States Bankruptcy Court for the Western District of North Carolina. On November 16, 2021, the Chapter 11 Case was transferred to the United States Bankruptcy Court for the District of New Jersey [Doc. No. 416].

2. Mr. Qusba is a partner of the firm of Simpson Thacher & Bartlett LLP, which maintains offices at, among other places, 425 Lexington Avenue, New York, New York 10017. Because of his familiarity with the facts and circumstances relevant to the Debtors in the within matter, Bausch Health requests that Mr. Qusba be allowed to appear *pro hac vice* for the purposes of representing Bausch Health in connection with the Chapter 11 Case.

3. As set forth in the accompanying Certification of Sandeep Qusba, Esq., Mr. Qusba is a member in good standing of the bar of the State of New York and the United States District Court for the Southern District of New York. Mr. Qusba is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Qusba has represented that he will adhere to the disciplinary jurisdiction of this Court. Mr. Qusba also has represented that he will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 2090-1 and L. Civ. R. 101.1(c), to admit Sandeep Qusba, Esq. *pro hac vice* in the above-captioned matter.

Dated: April 5, 2023

Respectfully submitted,

/s/ Alan J. Brody

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